

ECF CASE
JUDGE MARRERO

UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK

J & J SPORTS PRODUCTIONS, INC., as
Broadcast Licensee of the **May 5, 2007**
DeLaHoya/Mayweather Program

Plaintiff,

-against-

RICARDO RAMIREZ and CARMEN RAMIREZ,
Individually, and as officers, directors, shareholders
and/or principals of DON RICARDO STEAK
HOUSE LLC d/b/a DON RICARDO
RESTAURANT a/k/a DON RICARDO
STEAKHOUSE,

and

DON RICARDO STEAK HOUSE LLC d/b/a DON
RICARDO RESTAURANT a/k/a DON RICARDO
STEAKHOUSE,

Defendants.

**NOTICE OF MOTION FOR
DEFAULT JUDGMENT**

Civil Action No.07-CV-8106-VM-KNF
HON. VICTOR MARRERO

PLEASE TAKE NOTICE that upon the affirmation of Julie Cohen Lonstein, sworn to
on the 5th day of Decwember 2007, in support of said application and the exhibits attached
thereto, Plaintiff moves this Court for an order granting the entry of default judgment against the
Defendants jointly and severally as follows:

**Against, RICARDO RAMIREZ Individually, and as officers, directors, shareholders
and/or principals of DON RICARDO STEAK HOUSE LLC d/b/a DON RICARDO
RESTAURANT a/k/a DON RICARDO STEAKHOUSE**

- 1) under 605(e)(3)(C)(i)(II) a sum *in the discretion of the Court*, of up to TEN
THOUSAND DOLLARS (\$10,000.00)
- 2) and under 605(e)(3)(C)(ii) a sum *in the discretion of the Court*, of up to ONE
HUNDRED THOUSAND DOLLARS (\$100,000.00) for enhanced damages for

Defendant's willful violation of 605(a)

- 3) and under 605(e)(3)(B)(iii) *in the discretion of the Court*, costs and Attorney fees of FOUR HUNDRED SIXTY SIX DOLLARS AND SIXTY SIX CENTS (\$466.66)

Against, CARMEN RAMIREZ, Individually, and as officers, directors, shareholders and/or principals of DON RICARDO STEAK HOUSE LLC d/b/a DON RICARDO RESTAURANT a/k/a DON RICARDO STEAKHOUSE

- 1) under 605(e)(3)(C)(i)(II) a sum *in the discretion of the Court*, of up to TEN THOUSAND DOLLARS (\$10,000.00)
- 2) and under 605(e)(3)(C)(ii) a sum *in the discretion of the Court*, of up to ONE HUNDRED THOUSAND DOLLARS (\$100,000.00) for enhanced damages for Defendant's willful violation of 605(a)
- 3) and under 605(e)(3)(B)(iii) *in the discretion of the Court*, costs and Attorney fees of FOUR HUNDRED SIXTY SIX DOLLARS AND SIXTY SIX CENTS (\$466.66)

Against, DON RICARDO STEAK HOUSE LLC d/b/a DON RICARDO RESTAURANT a/k/a DON RICARDO STEAKHOUSE,

- 1) under 605(e)(3)(C)(i)(II) a sum *in the discretion of the Court*, of up to TEN THOUSAND DOLLARS (\$10,000.00)
- 2) and under 605(e)(3)(C)(ii) a sum *in the discretion of the Court*, of up to ONE HUNDRED THOUSAND DOLLARS (\$100,000.00) for enhanced damages for Defendant's willful violation of 605(a)
- 3) and under 605(e)(3)(B)(iii) *in the discretion of the Court*, costs and Attorney fees of FOUR HUNDRED SIXTY SIX DOLLARS AND SIXTY SIX CENTS (\$466.66)

Dated: December 4, 2007
Ellenville, NY 12428

LONSTEIN LAW OFFICE, P.C.

By: /s/ Julie Cohen Lonstein
Julie Cohen Lonstein
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